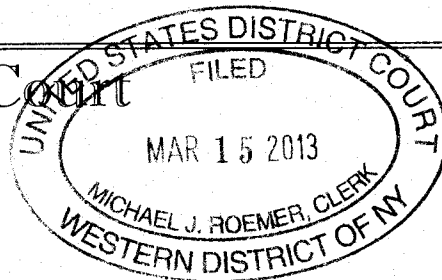


## United States District Court

for the  
Western District of New York

United States of America

v.

RYAN C. LANDER,

*Defendant*

Case No. 13-M-j - 552

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about the dates of January 2010 through to the present, in the County of Steuben in the Western District of New York, the defendant violated 18 U.S.C. §§ 2252A(a)(5)(B) and Section 2251(a), such offenses described as follows:

the defendant, knowingly used a person less than 18 years old to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256 for the purpose of producing visual depictions of that person engaging in such conduct and the visual depictions were produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a); AND the defendant, knowingly possessed child pornography with the images of child pornography having been produced using materials that had been mailed, shipped or transported in and affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

This criminal complaint is based on these facts:

- Continued on the attached sheet.

*Complainant's signature*

Reginald E. Mathews, Special Agent  
Department of Homeland Security-HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 15, 2013

*Judge's signature*

City and State: ROCHESTER, NEW YORK

Honorable Jonathan W. Feldman  
United States Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK )  
COUNTY OF MONROE ) SS:  
CITY OF ROCHESTER )

I, Reginald E. Mathews, being duly sworn, deposes and says:

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) recently assigned to Buffalo, NY. I have been a Special Agent with DHS since 2003.

2. My duties involve investigating federal crimes including violations of Title 18, United States Code, Sections 2251, 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and have observed and reviewed numerous examples of child pornography, as defined by Title 18, United States Code, Section 2256, in various forms of media including computer media.

3. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers, witnesses and the defendant in this case, along with the review of documents and records. This affidavit is submitted for the limited purpose of establishing probable cause to believe that RYAN C. LANDER, DOB

XX/XX/1977, while in the Western District of New York, did knowingly produce and possess images of minors engaging in sexually explicit conduct (i.e., child pornography) that were produced using materials that had been shipped, mailed, transported in or affecting interstate and foreign commerce in violation of Title 18, United States Code, Sections 2251(a), which makes it a crime to use a child for sexually explicit conduct for the purpose of producing a visual depiction of that conduct; and 2252A(a)(5)(B), which makes it a crime to possess child pornography (collectively, the "Specified Federal Offenses").

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to arrest said subject. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

#### BASIS FOR PROBABLE CAUSE

5. In or about January 2013, your affiant was assigned an investigation that had originated from the Philadelphia, PA, HSI office regarding a website that allows individuals to share photographs. Activity had been observed on the website on or about

March 13, 2012, that a particular user with the screen name "pantysnfr," was posting pictures, the majority of which depicted the same three, prepubescent females (later identified as Victim 1, 19 months of age; Victim 2, 4 years of age; and Victim 3, 8 years of age), all clothed, and was posting pictures of children's underwear and diapers.

6. The investigation identified the user of the screen name "pantysnfr" on the website to be RYAN C. LANDER, DOB: XX/XX/1977, residing at 1580 Kurtz Hollow Road, Dansville, NY, in Steuben County, NY.

7. On or about March 7, 2013, your affiant and other HSI Special Agents went to speak with LANDER at his residence of 1580 Kurtz Hollow Road, Dansville, NY. During the interview, LANDER admitted to using the screen name "pantysnfr" on the website and admitted that he was attracted to young children. Specifically, he was attracted to children between the ages of 8 to 12. He further stated that he was attracted to Victims 1, 2 and 3, all minors known to him, although he claimed never to have touched them. LANDER admitted to posting the pictures of Victims 1, 2 and 3 and admitted to taking the pictures using a SONY camera. LANDER permitted to Special Agents search his residence to see if any minors were present and during this search, agents discovered several children's underwear in LANDER's room.

LANDER admitted that he would masturbate using the underwear.

9. On that same date, LANDER executed a consent to search form for Special Agents to allow Special Agents to seize and search two eMachine computer towers and one laptop. LANDER also provided consent for the agents to seize and search a bag containing a camera and multiple storage devices. Later, the Special Agents discovered a pinhole camera inside the bag.

10. A review of the evidence provided by LANDER revealed that on one of the two eMachine computer towers that LANDER had provided to the agents, and had provided consent to search, contained child pornography. Specifically, Special Agents discovered the following images:

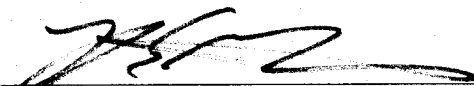
- a. A picture of a little girl touching an exposed penis. The little girl in the photograph appears to be Victim 1.
- b. A picture of a little girl putting a ring on an exposed penis. This little girl also appears to be Victim 1.
- c. A picture of a little girl, who looks like Victim 2, standing next to the toilet in a bathroom with her genitalia exposed.

13. eMachine is a computer manufacturer based in Irvine,

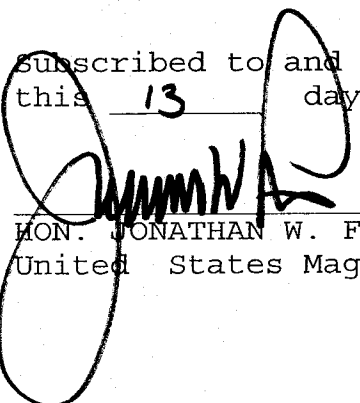
California.

CONCLUSION

Based upon the information set forth in this affidavit, by your affiant, it respectfully submitted that there is probable cause to believe that RYAN C. LANDER, has violated Title 18, United States Code, Sections 2251(a) which makes it a crime to use a child for sexually explicit conduct for the purpose of producing a visual depiction and the visual depiction was produced using materials that have been mailed, shipped or transported in or affecting interstate or foreign commerce; and 2252A(a)(5)(B), the knowing possession of child pornography with the images of child pornography having been produced using materials that had been mailed, shipped or transported in or affecting interstate or foreign commerce.

  
Reginald E. Mathews  
Special Agent  
Department of Homeland Security  
Investigations

Subscribed to and sworn before me  
this 13 day of March 2013.

  
HON. JONATHAN W. FELDMAN  
United States Magistrate Judge